



Your business
is our business.

REDACTED FOR PUBLIC INSPECTION

7852 Walker Drive, Suite 200
Greenbelt, Maryland 20770
phone: 301-459-7590, fax: 301-577-5575
internet: www.jsitel.com, e-mail: jsi@jsitel.com

June 21, 2017

Via Hand Delivery

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 12th Street, SW
Washington, DC 20554

**Re: WC Docket No. 14-58
2017 ETC Annual Report of Moundville Telephone Company
Study Area Code 250307**

Dear Ms. Dortch:

On behalf of Moundville Telephone Company ("Company"), JSI files the attached confidential version of the FCC Form 481 ETC annual reporting information pursuant to sections 54.313 and 54.422 of the Commission's rules.¹ Company seeks confidential treatment under Protective Order for section 54.313(f)(2) financial information.² The redacted version is being filed this date via the FCC's Electronic Comment Filing System.

Please direct any questions regarding the filing to the undersigned.

Sincerely,

John Kuykendall
JSI Vice President
301-459-7590
jkuykendall@jsitel.com

¹ 47 C.F.R. §§ 54.313, 54.422.

² *Connect America Fund et al.*, WC Docket Nos. 10-90 and 14-58, Protective Order, DA 16-296 rel. March 22, 2016 (Protective Order). 47 C.F.R. § 54.313(f)(2).

**FCC Form 481 - Carrier Annual Reporting
Data Collection Form****REDACTED FOR PUBLIC INSPECTION**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	250307
<015>	Study Area Name	MOUNDVILLE TEL CO
<020>	Program Year	2018
<030>	Contact Name: Person USAC should contact with questions about this data	Scott Taylor
<035>	Contact Telephone Number: Number of the person identified in data line <030>	2053719011 ext.
<039>	Contact Email Address: Email of the person identified in data line <030>	scott@mound.net
Form Type		54.313 and 54.422

(300) Unfulfilled Service Request Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	250307
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<020>	Program Year	2018
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<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net

<300> Unfulfilled service request (voice)

0

<310> Detail on attempts (voice)

Name of Attached Document

<320> Unfulfilled service request (broadband)

10

250307a1330.pdf

<330> Detail on attempts (broadband)

Name of Attached Document

(400) Number of Complaints per 1,000 customers Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	250307
<015>	Study Area Name	MOUNDVILLE TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Scott Taylor
<035>	Contact Telephone Number - Number of person identified in data line <030>	2053719011 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net
<400>	Select from the drop-down list to indicate how you would like to report voice complaints (zero or greater) for voice telephony service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	
<410>	Complaints per 1000 customers for fixed voice	Offered only fixed voice 0 . 0
<420>	Complaints per 1000 customers for mobile voice	
<430>	Select from the drop-down list to indicate how you would like to report end-user customer complaints (zero or greater) for broadband service in the prior calendar year for each service area in which you are designated an ETC for any facilities you own, operate, lease, or otherwise utilize.	
<440>	Complaints per 1000 customers for fixed broadband	Offered only fixed broadband 0 . 0
<450>	Complaints per 1000 customers for mobile broadband	

(500) Compliance With Service Quality Standards and Consumer Protection Rules Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Scott Taylor
<035>	Contact Telephone Number - Number of person identified in data line <030>	2053719011 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net
<500>	Certify compliance with applicable service quality standards and consumer protection rules	Yes
250307a1510.pdf		
<510>	Descriptive document for Service Quality Standards & Consumer Protection Rules Compliance	
<515>	Certify compliance with applicable minimum service standards	

(600) Functionality in Emergency Situations Data Collection Form	REDACTED FOR PUBLIC INSPECTION	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	250307
<015>	Study Area Name	MOUNDVILLE TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Scott Taylor
<035>	Contact Telephone Number - Number of person identified in data line <030>	2053719011 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net
<600>	Certify compliance regarding ability to function in emergency situations	Yes
<610>	Descriptive document for Functionality in Emergency Situations	250307a1610.pdf

(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	250307
<015>	Study Area Name	MOUNDVILLE TEL CO
<020>	Program Year	2018
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<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net

[illegible]

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net
<810>	Reporting Carrier	Moundville Telephone Company
<811>	Holding Company	Moundville Communications, Inc.
<812>	Operating Company	Moundville Telephone Company

[illegible]

**(900) Tribal Lands Reporting
Data Collection Form**

FCC Form 481
OMB Control No. 3060-0986/OMB Control No. 3060-0819
July 2013

<010>	Study Area Code	250307
<015>	Study Area Name	MOUNDVILLE TEL CO
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<030>	Contact Name - Person USAC should contact regarding this data	Scott Taylor
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<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net

<900> Does the filing entity offer tribal land services? (Y/N) No

<910> Tribal Land(s) on which ETC Serves

<920> Tribal Government Engagement Obligation

Name of Attached Document

If your company serves Tribal lands, please select (Yes,No, NA) for each these boxes to confirm the status described on the attached PDF, on line 920, demonstrates coordination with the Tribal government pursuant to § 54.313(a)(9) includes:

- <921> Needs assessment and deployment planning with a focus on Tribal community anchor institutions.
- <922> Feasibility and sustainability planning;
- <923> Marketing services in a culturally sensitive manner;
- <924> Compliance with Rights of way processes
- <925> Compliance with Land Use permitting requirements
- <926> Compliance with Facilities Siting rules
- <927> Compliance with Environmental Review processes
- <928> Compliance with Cultural Preservation review processes
- <929> Compliance with Tribal Business and Licensing requirements.

Select Yes or No or Not Applicable

**(1000) Voice and Broadband Service Rate Comparability
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net

<1000> Voice services rate comparability certification Yes

<1010> Attach detailed description for voice services rate comparability compliance

Name of Attached Document

<1020> Broadband comparability certification

Yes - Pricing is no more than the most recent applicable benchmark announced by the Wireline Competition Bureau

<1030> Attach detailed description for broadband comparability compliance

Name of Attached Document

**(1100) No Terrestrial Backhaul Reporting
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	250307
<015>	Study Area Name	MOUNDVILLE TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Scott Taylor
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<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net

<1100> Certify whether terrestrial backhaul options exist (Y/N)

Yes

<1130> Please select the appropriate response (Yes, No, Not Applicable) to confirm the reporting carrier offers broadband service of at least 1 Mbps downstream and 256 kbps upstream within the supported area pursuant to § 54.313(g).

(1200) Terms and Condition for Lifeline Customers
Lifeline
Data Collection Form

FCC Form 481
 OMB Control No. 3060-0986/OMB Control No. 3060-0819
 July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net

250307a11210.pdf

Name of Attached Document

<1210> Terms & Conditions of Voice Telephony Lifeline Plans

<1220> Link to Public Website

HTTP

"Please check these boxes below to confirm that the attached document(s), on line 1210, or the website listed, on line 1220, contains the required information pursuant to § 54.422(a)(2) annual reporting for ETCs receiving low-income support, carriers must annually report:

<1221> Information describing the terms and conditions of any voice telephony service plans offered to Lifeline subscribers, ☒

<1222> Details on the number of minutes provided as part of the plan, ☒

<1223> Additional charges for toll calls, and rates for each such plan. ☒

(2005) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010>	Study Area Code	250307
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<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net

Select the appropriate responses below (Yes, No, Not Applicable) to note compliance as a recipient of Incremental High Cost support, High Cost support to offset access charge reductions, and Connect America Phase II support as set forth in 47 CFR § 54.313(b),(c),(d),(e). The information reported on this form and in the documents attached below is accurate.

Incremental Connect America Phase I reporting

<p><2011> 3rd Year Certification 47 CFR §54.313(b)(1)(ii) - Note that for the July 2017 certification, this applies to Round 2 recipients of Incremental Support.</p>	<input style="width: 100px; height: 20px;" type="text"/>	
<p><2022> Recipient certifies, representing year three after filing a notice of acceptance of funding pursuant to 54.312(c), that the locations in question are not receiving support under the Broadband Initiatives Program or the Broadband Technology Opportunities Program for projects that will provide broadband with speeds of at least 4 Mbps/1Mbps - 54.313(b)(2)(i). Round 2 recipients only.</p>	<input style="width: 100px; height: 20px;" type="text"/>	
<p><2023> The attachment on line 2024 includes a statement of the total amount of capital funding expended in the previous year in meeting Connect America Phase I deployment obligations, accompanied by a list of census blocks indicating where funding was spent. This covers year three - 54.313(b)(2)(ii). Round 2 recipients only.</p>	<input style="width: 100px; height: 20px;" type="text"/>	
<p><2024A> Round 2 Recipient of Incremental Support?</p>	<input style="width: 100px; height: 20px;" type="text"/>	<input style="width: 200px; height: 60px;" type="text"/>
<p><2024B> Attach list of census blocks indicating where funding was spent in year three - 54.313(b)(2)(ii). Round 2 recipients only.</p>	<p>Name of Attached Document Listing Required Information</p>	<input style="width: 200px; height: 60px;" type="text"/>
<p><2025A> Round 2 Recipient of Incremental Support?</p>	<input style="width: 100px; height: 20px;" type="text"/>	
<p><2025B> Attach geocoded Information for Phase I milestone reports (Round 2 for year three) - Connect America Fund , WC Docket 10-90, Report and Order, FCC 13-73, paragraph 35 (May 22, 2013).</p>	<p>Name of Attached Document Listing Required Information</p>	<input style="width: 200px; height: 60px;" type="text"/>
<p><2015> 2016 and future Frozen Support Certification 47 CFR § 54.313(c)(4)</p>	<input style="width: 100px; height: 20px;" type="text"/>	

(2005) Price Cap Carrier Additional Documentation

Data Collection Form

Including Rate-of-Return Carriers affiliated with Price Cap Local Exchange Carriers

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

Price Cap Carrier Connect America ICC Support {47 CFR § 54.313(d)}

<2016> Certification support used to build broadband

Connect America Phase II Reporting {47 CFR § 54.313(e)}

<2017A> Connect America Fund Phase II recipient?

<2017C> Total amount of Phase II support, if any, the price cap carrier used for capital expenditures in 2016.

<2018> Attach the number, names, and addresses of community anchor institutions to which the carrier newly began providing access to broadband service in the preceding calendar year - 54.313(e)(1)(ii)(A)

Name of Attached Document Listing
Required Information

<2019> Recipient certifies that it bid on category one telecommunications and Internet access services in response to all FCC Form 470 postings seeking broadband service that meets the connectivity targets for the schools and libraries universal service support program for eligible schools and libraries located within any area in a census block where the carrier is receiving Phase II model-based support, and that such bids were at rates reasonably comparable to rates charged to eligible schools and libraries in urban areas for comparable offerings - 54.313(e)(1)(ii)(C)

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Select from the drop down menu or check the boxes below to note compliance with 54.313(f)(1). Privately held carriers must ensure compliance with the financial reporting requirements set forth in 47 CFR 54.313(f)(2). I further certify that the information reported on this form and in the documents attached below is accurate.

(3009)	Progress Report on 5 Year Plan Carrier certifies to 54.313(f)(1)(iii)		
		Yes - Attach Certification	
(3010A)	Certification of Public Interest Obligations {47 CFR § 54.313(f)(1)(i)}		
(3010B)	Please Provide Attachment	Name of Attached Document Listing Required Information	250307a13010.pdf
(3012A)	Community Anchor Institutions {47 CFR § 54.313(f)(1)(ii)}	No - No New Community Anchors	
(3012B)	Please Provide Attachment	Name of Attached Document Listing Required Information	
(3013)	Is your company a Privately Held ROR Carrier {47 CFR § 54.313(f)(2)}	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
(3014)	If yes, does your company file the RUS annual report	(Yes/No)	<input type="radio"/> <input checked="" type="radio"/>
Please check these boxes to confirm that the attached PDF, on line 3017, contains the required information pursuant to § 54.313(f)(2) compliance requires:			
(3015)	Electronic copy of their annual RUS reports (Operating Report for Telecommunications Borrowers)		<input type="checkbox"/>
(3016)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3017)	If the response is yes on line 3014, attach your company's RUS annual report and all required documentation	Name of Attached Document Listing Required Information	
(3018)	If the response is no on line 3014, is your company audited?	(Yes/No)	<input checked="" type="radio"/> <input type="radio"/>
If the response is yes on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3019)	Either a copy of their audited financial statement; or (2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input checked="" type="checkbox"/>
(3020)	Document(s) for Balance Sheet, Income Statement and Statement of Cash Flows		<input checked="" type="checkbox"/>
(3021)	Management letter and/or audit opinion issued by the independent certified public accountant that performed the company's financial audit.		<input checked="" type="checkbox"/>
If the response is no on line 3018, please check the boxes below to confirm your submission on line 3026 pursuant to § 54.313(f)(2), contains:			
(3022)	Copy of their financial statement which has been subject to review by an independent certified public accountant; or 2) a financial report in a format comparable to RUS Operating Report for Telecommunications Borrowers		<input type="checkbox"/>
(3023)	Underlying information subjected to a review by an independent certified public accountant		<input type="checkbox"/>
(3024)	Underlying information subjected to an officer certification.		<input type="checkbox"/>
(3025)	Document(s) with Balance Sheet, Income Statement and Statement of Cash Flows		<input type="checkbox"/>
(3026)	Attach the worksheet listing required information	Name of Attached Document Listing Required Information	250307a13026.pdf

REDACTED FOR PUBLIC INSPECTION

(3005) Rate Of Return Carrier Additional Documentation (Continued)

FCC Form 481

Data Collection Form

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

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<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net

Financial Data Summary

(3027) Revenue

(3028) Operating Expenses

(3029) Net Income

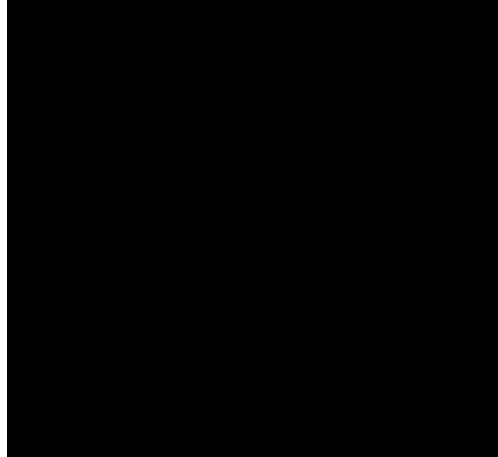
(3030) Telephone Plant In Service(TPIS)

(3031) Total Assets

(3032) Total Debt

(3033) Total Equity

(3034) Dividends



(4005) Rural Broadband Experiment Additional Documentation Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	250307
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<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net

4005 Rural Broadband Experiment

Authorized Rural Broadband Experiment (RBE) recipients must address the certification for public interest obligations, provide a list of newly served community anchor institutions, and provide a list of locations where broadband has been deployed.

Public Interest Obligations – FCC 14-98 (paragraphs 26-29, 78)

Please address Line 4001 regarding compliance with the Commission’s public interest obligations. All RBE participants must provide a response to Line 4001.

4001. Recipient certifies that it is offering broadband to the identified locations meeting the requisite public interest obligations consistent with the category for which they were selected, including broadband speed, latency, usage capacity, and rates that are reasonably comparable to rates for comparable offerings in urban areas?

Community Anchor Institutions – FCC 14-98 (paragraph 79)

4003a. RBE participants must provide the number, names, and addresses of community anchor institutions to which they newly deployed broadband service in the preceding calendar year. On this line, please respond (yes – attach new community anchors, no – no new anchors) to indicate whether this list will be provided.

If yes to 4003A, please provide a response for 4003B.

4003b. Provide the number, names and addresses of community anchor institutions to which the recipient newly began providing access to broadband service in the preceding calendar year.	Name of Attached Document Listing Required Information	
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Broadband Deployment Locations – FCC 14-98 (paragraph 80)

4004a. Attach a list of geocoded locations to which broadband has been deployed as of the June 1st immediately preceding the July 1st filing deadline for the FCC Form 481.	Name of Attached Document Listing Required Information	
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4004b. Attach evidence demonstrating that the recipient is meeting the relevant public service obligations for the identified locations. Materials must at least detail the pricing, offered broadband speed and data usage allowances available in the relevant geographic area.	Name of Attached Document Listing Required Information	
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Certification - Reporting Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	250307
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<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF THE REPORTING CARRIER IS FILING ANNUAL REPORTING ON ITS OWN BEHALF:

Certification of Officer as to the Accuracy of the Data Reported for the Annual Reporting for CAF or LI Recipients	
I certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual reporting requirements for universal service support recipients; and, to the best of my knowledge, the information reported on this form and in any attachments is accurate.	
Name of Reporting Carrier:	
Signature of Authorized Officer:	Date
Printed name of Authorized Officer:	
Title or position of Authorized Officer:	
Telephone number of Authorized Officer:	
Study Area Code of Reporting Carrier:	Filing Due Date for this form:
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Certification - Agent / Carrier Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010> Study Area Code	250307
<015> Study Area Name	MOUNDVILLE TEL CO
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<039> Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net

TO BE COMPLETED BY THE REPORTING CARRIER, IF AN AGENT IS FILING ANNUAL REPORTS ON THE CARRIER'S BEHALF:

Certification of Officer to Authorize an Agent to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I certify that (Name of Agent) <u>John Staurulakis, Inc.</u> is authorized to submit the information reported on behalf of the reporting carrier. I also certify that I am an officer of the reporting carrier; my responsibilities include ensuring the accuracy of the annual data reporting requirements provided to the authorized agent; and, to the best of my knowledge, the reports and data provided to the authorized agent is accurate.	
Name of Authorized Agent:	John Staurulakis, Inc.
Name of Reporting Carrier:	MOUNDVILLE TEL CO
Signature of Authorized Officer:	CERTIFIED ONLINE Date: 06/20/2017
Printed name of Authorized Officer:	Scott Taylor
Title or position of Authorized Officer:	President
Telephone number of Authorized Officer:	2053719011 ext.
Study Area Code of Reporting Carrier:	250307 Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

TO BE COMPLETED BY THE AUTHORIZED AGENT:

Certification of Agent Authorized to File Annual Reports for CAF or LI Recipients on Behalf of Reporting Carrier	
I, as agent for the reporting carrier, certify that I am authorized to submit the annual reports for universal service support recipients on behalf of the reporting carrier; I have provided the data reported herein based on data provided by the reporting carrier; and, to the best of my knowledge, the information reported herein is accurate.	
Name of Reporting Carrier:	MOUNDVILLE TEL CO
Name of Authorized Agent Firm:	John Staurulakis, Inc.
Signature of Authorized Agent or Employee of Agent:	CERTIFIED ONLINE Date: 06/16/2017
Name of Authorized Agent Employee:	John Staurulakis, Inc.
Title or position of Authorized Agent or Employee of Agent	Manager - Regulatory Affairs
Telephone number of Authorized Agent or Employee of Agent:	5123380473 ext.
Study Area Code of Reporting Carrier:	250307 Filing Due Date for this form: 07/03/2017
Persons willfully making false statements on this form can be punished by fine or forfeiture under the Communications Act of 1934, 47 U.S.C. §§ 502, 503(b), or fine or imprisonment under Title 18 of the United States Code, 18 U.S.C. § 1001.	

Attachments

UNFULFILLED BROADBAND REQUESTS -LINE 330

Customer #	Location	Contact Type	Start Date	Description	Detail on Attempt to Fill
Customer 1	Moundville	UNFULFILLED BROADBAND	10/2/16	Request service but customer resides too far from closest remote location and notified the customer as much.	Evaluated customer location and cost of service- request unreasonable at this time
Customer 2	Moundville	UNFULFILLED BROADBAND	2/24/16	Customer request faster service. Remote equipment serving the area has limited capacity, faster speed not available at this time.	Notified customer of plans to increase capacity of remote equipment (fiber). Higher speeds will be available then. Will contact the customer when avaialble.
Customer 3	Moundville	UNFULFILLED BROADBAND	3/7/16	Customer request faster service. Remote equipment serving the area has limited capacity, faster speed not available at this time.	Notified customer of plans to increase capacity of remote equipment (fiber). Higher speeds will be available then. Will contact the customer when avaialble.
Customer 4	Moundville	UNFULFILLED BROADBAND	5/20/16	Customer request faster service. Remote equipment serving the area has limited capacity, faster speed not available at this time.	Notified customer of plans to increase capacity of remote equipment (fiber). Higher speeds will be available then. Will contact the customer when avaialble.
Customer 5	Moundville	UNFULFILLED BROADBAND	6/16/16	Customer request faster service. Remote equipment serving the area has limited capacity, faster speed not available at this time.	Notified customer of plans to increase capacity of remote equipment (fiber). Higher speeds will be available then. Will contact the customer when avaialble.

Customer #	Location	Contact Type	Start Date	Description	Detail on Attempt to Fill
Customer 6	Moundville	UNFULFILLED BROADBAND	6/28/16	Customer request faster service. Remote equipment serving the area has limited capacity, faster speed not available at this time.	Notified customer of plans to increase capacity of remote equipment (fiber). Higher speeds will be available then. Will contact the customer when available.
Customer 7	Moundville	UNFULFILLED BROADBAND	8/8/16	Customer request faster service. Remote equipment serving the area has limited capacity, faster speed not available at this time.	Notified customer of plans to increase capacity of remote equipment (fiber). Higher speeds will be available then. Will contact the customer when available.
Customer 8	Moundville	UNFULFILLED BROADBAND	9/23/16	Customer request faster service. Remote equipment serving the area has limited capacity, faster speed not available at this time.	Notified customer of plans to increase capacity of remote equipment (fiber). Higher speeds will be available then. Will contact the customer when available.
Customer 9	Moundville	UNFULFILLED BROADBAND	11/4/16	Customer request faster service. Remote equipment serving the area has limited capacity, faster speed not available at this time.	Notified customer of plans to increase capacity of remote equipment (fiber). Higher speeds will be available then. Will contact the customer when available.
Customer 10	Moundville	UNFULFILLED BROADBAND	11/21/16	Customer request faster service. Remote equipment serving the area has limited capacity, faster speed not available at this time.	Notified customer of plans to increase capacity of remote equipment (fiber). Higher speeds will be available then. Will contact the customer when available.

Moundville Telephone Company

Study Area Code: 250307

Response to Line 510 - Service Quality Standards and Consumer Protection Rules

Compliance – Voice and Broadband

In establishing this certification in its *2005 ETC Order*,¹ the FCC found that an ETC must make “a specific commitment to objective measures to protect consumers.”² The FCC found that for wireless ETCs, compliance with CTIA’s Consumer Code for Wireless Service would satisfy this requirement and that the sufficiency of other commitments would be considered on a case-by-case basis.³ In this context, the FCC stated, “to the extent a wireline or wireless ETC applicant is subject to consumer protection obligations under state law, compliance with such laws may meet our requirement.”⁴

Moundville Telephone Company (“Company”) hereby certifies that it is complying with applicable service quality standards and consumer protection rules. The Company is subject to consumer protection obligations under state law. These obligations include, but are not limited to, the following: (1) filing a Local Exchange Tariff pursuant to the requirements of the Alabama Public Service Commission’s Rules and Regulations, Telephone Rules, Rule T-12, Filing of Telephone Tariffs and The Code of Alabama 1975 Section 37-1-81, which disclose rates, terms

¹ *Federal-State Joint Board on Universal Service*, CC Docket No. 96-45, Report and Order, FCC 05-46 (rel. Mar. 17, 2005) (“*2005 ETC Order*”).

² *Id.* at para. 28.

³ *Id.* The FCC noted that under the CTIA Consumer Code, wireless carriers agree to: “(1) disclose rates and terms of service to customers; (2) make available maps showing where service is generally available; (3) provide contract terms to customers and confirm changes in service; (4) allow a trial period for new service; (5) provide specific disclosures in advertising; (6) separately identify carrier charges from taxes on billing statements; (7) provide customers the right to terminate service for changes to contract terms; (8) provide ready access to customer service; (9) promptly respond to consumer inquiries and complaints received from government agencies; and (10) abide by policies for protection of consumer privacy.” *Id.* at n. 71.

⁴ *Id.* at n. 72.

and conditions of service to customers; (2) adherence to state consumer protection requirements governing telephone providers which require adherence to minimum service standards as identified in the Alabama Public Service Commission's Rules and Regulations, Telephone Rules, Rule T-21, protection against cramming and other deceptive practices as identified in Rule T-16(C)(11); (3) truth-in-billing requirements as identified in Rule T-16; and (4) CPNI, Red Flag Rules and other applicable federal and state requirements governing the protection of customers' privacy.

The Company is subject to consumer protection obligations for broadband services under federal law. These obligations include, but are not limited to, the following: public disclosure of accurate information regarding network management practices, performance, and commercial terms of broadband internet access services; as a means of providing sufficient information for consumers to make informed choices regarding use of such services, and for content, application, service and device providers to develop, market, and maintain internet offerings as specified in F.C.C. 47 C.F.R. Part 8 §8.3. The Company furthermore will comply with all requirements set forth in the *2015 Open Internet Order*, as it applies to the Company.

Moundville Telephone Company

Study Area Code: 250307

**Response to Line 610 - Ability to Function in Emergency Situations for Voice and
Broadband**

Moundville Telephone Company (“Company”) hereby certifies that it is able to function in emergency situations as set forth in the Code of Federal Regulations, Title 47, Part 54, Subpart C, §54.202(a)(2)¹ and the applicable Alabama Public Service Commission Rules and Regulations, Telephone Rules. The Company’s network is designed to remain functional in emergency situations without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations as required by Section 54.202(a)(2). The Company can change call routing translations as needed to reroute traffic around damaged facilities. Changing call routing translations also allows the Company to manage traffic spikes throughout its network, as emergency situations require.

Specifically, each central office building is supplied with standby generators and battery back-up that enable the central office to keep running until power is restored so long as fuel is available, or until system changes are made to reroute traffic. The Company’s central office(s) that have twenty-four (24) hour maintenance coverage or have an automatic start engine alternator can provide a minimum of three (3) hours of batter reserve in accordance with the Alabama Public Service Commission Rules and Regulations, Telephone Rules, Rule T-21(L)(2). All other central office(s), as and if applicable, have a minimum of eight (8) hours of battery reserve In accordance

¹ Section 54.202(a)(2) requires ETCs that are designated by the Commission to “demonstrate its ability to remain functional in emergency situations, including a demonstration that it has a reasonable amount of back-up power to ensure functionality without an external power source, is able to reroute traffic around damaged facilities, and is capable of managing traffic spikes resulting from emergency situations.”

with Rule T-21(L)(2).The Company's standby generators and battery back-up equipment support both voice and broadband network equipment in the event of an emergency situation.

The MTC central office is equipped with a natural gas generator that will power all voice and broadband equipment as well as being equipped with recently-replaced battery back-ups to maintain power during a transition from commercial to back-up power and for a minimum of eight (8) hours should the fuel supply be interrupted. All remote equipment locations have batteries to maintain them for a minimum of eight (8) hours. Portable generators are also available for extended periods of commercial power interruptions.

The Company's standby generators and battery back-up support both voice and broadband network equipment should an emergency situation occur.

REDACTED FOR PUBLIC INSPECTION

**(700) Price Offerings including Voice Rate Data
Data Collection Form**

FCC Form 481

OMB Control No. 3060-0986/OMB Control No. 3060-0819

July 2013

<010> Study Area Code 250307

<015>	Study Area Name	MOUNDVILLE TEL CO
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<020> Program Year 2018

<030> Contact Name - Person USAC should contact regarding this data Scott Taylor

<035>	Contact Telephone Number - Number of person identified in data line <030>	2053719011 ext.
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<039> Contact Email Address - Email Address of person identified in data line <030> scott@mound.net

1/1/2017

<703>

[illegible]

REDACTED FOR PUBLIC INSPECTION

(710) Broadband Price Offerings Data Collection Form	FCC Form 481 OMB Control No. 3060-0986/OMB Control No. 3060-0819 July 2013
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<010>	Study Area Code	250307
<015>	Study Area Name	MOUNDVILLE TEL CO
<020>	Program Year	2018
<030>	Contact Name - Person USAC should contact regarding this data	Scott Taylor
<035>	Contact Telephone Number - Number of person identified in data line <030>	2053719011 ext.
<039>	Contact Email Address - Email Address of person identified in data line <030>	scott@mound.net

[illegible]

Moundville Telephone Company

Study Area Code: 250307

Rates, Terms and Conditions for Lifeline Service

(Response to Form 481, Line 1210)

Local exchange service rates and charges as specified below are for basic local exchange service, including Tone Dialing Service, and facilities only. The rates for other ancillary services not specifically shown below are presented in Moundville Telephone Company's tariff(s) on file with the Alabama Public Service Commission. Unless otherwise specified, the rates and charges quoted below are for a period of one month, payable in advance and provide unlimited flat rate calling within the local exchange calling scope.

Residential Local Exchange Access Line Rates are provided in Line 700 included herein this ETC Annual Report. The residential local service rates listed in Line 700 do not include all mandatory taxes, fees and surcharges, including, but not limited to, state and local taxes, 9-1-1 fees and municipal franchise fees. Qualified Lifeline customers are eligible for Lifeline credits or discounts as outlined in the attached Lifeline tariff.

Moundville Telephone Co., Inc.

Section 2
3rd Revised Sheet 6
Cancels 2nd Revised Sheet 6

S2. BASIC LOCAL EXCHANGE SERVICE

S2.14 Low-Income Assistance Programs

Lifeline Assistance is a retail service offering available to qualifying low-income subscribers as provided for below. Lifeline program consumers will have the choice (where applicable) of applying their benefit to one of the following service offerings: fixed voice (home phone); mobile voice (cell phone); fixed broadband; mobile broadband or broadband-voice bundle. An eligible customer receives credit for the Low-Income Program, pursuant to the Third Report and Order, Further Report and Order and Order of Reconsideration FCC 16-38 adopted March 31, 2016 and the APSC. (T)

A. Lifeline Assistance

1. **General**

Lifeline Assistance reduces an eligible customer's monthly rates for local service. An eligible customer receives credit pursuant to FCC Order 12-11, the Third Report and Order, Further Report and Order and Order of Reconsideration FCC 16-38 adopted March 31, 2016 and APSC Docket No. 25980, dated June 29, 2006, eligibility for participation in the Alabama Lifeline Program shall also be extended beyond a telephone subscriber's participation in the means-based programs referenced below also include any individual in the telephone subscriber's household. (T)

The telephone subscriber must, however, demonstrate that the household member relied upon for eligibility is eligible and participating in the means-based programs below and that the telephone subscriber is the financially responsible party for the qualifying member of his or her household or that the eligible household member is the telephone subscriber's dependent pursuant to the rules and regulations of the Internal Revenue Service. (N)

2. **Regulations**

Unless other eligibility requirements are established by the Commission or the FCC, Lifeline Assistance is available to all residential subscribers who participate in one of the following programs or the Income Based Criteria listed below: (N)

- 1) Medicaid,
- 2) Supplemental Nutrition Assistance Program (SNAP), formerly known as Food Stamps,
- 3) Supplemental Security Income (SSI),
- 4) Federal Public Housing Assistance (FPHA),
- 5) Federal Veterans and Survivors Pension Benefit. (T)

Income Based Criteria: Household gross monthly income does not exceed 135% of the Federal Poverty Guidelines, pursuant the Third Report and Order, Further Report and Order and Order of Reconsideration FCC 16-38, adopted March 31, 2016 amending the definition of income to align with the Internal Revenue Service's definition of gross income. (N)

Moundville Telephone Co., Inc.

Section 2
2nd Revised Sheet 6.1
Cancels 1st Revised Sheet 6.1

S2. BASIC LOCAL EXCHANGE SERVICE

S2.14 Low-Income Assistance Programs (Continued)

A. Lifeline Assistance (Continued)

2. Regulations (Continued)

- Each subscriber to Lifeline Assistance must certify in writing to the Company, under penalty of perjury, that he/she receives benefits under a program outlined in 1) through 5) above, and must, on the same document, agree to notify the Company if he/she ceases to participate in the program(s). The certification form shall conform to the requirements described herein, and shall be made available upon request to any subscriber. The Company shall retain all such subscriber certification pursuant to FCC Order 12-11, the Third Report and Order, Further Report and Order and Order of Reconsideration FCC 16-38 adopted March 31, 2016 in order to furnish proof of subscriber eligibility as may be required from time to time by Universal Service Administrators. (T) (N) (N)
- a. All applications for this service are subject to verifications with the state agency responsible for administration of the qualifying program until such time the FCC establishes the National Verifier System and is in effect for verification. The Company may request additional documentation deemed necessary prior to providing Lifeline benefits such as an administrating agency's official designation of eligibility in a particular means-based program for the subscriber or a member of the subscriber's household, or that the eligible household member is the telephone subscriber's dependent pursuant to the rules and regulations of the Internal Revenue Service. (N) (N) (N) | (N)
- b. The Company will reconcile and confirm eligibility periodically with the responsible agency. The Company will survey at least annually the entire Lifeline subscriber base, pursuant to FCC Order 12-11, the Third Report and Order, Further Report and Order and Order of Reconsideration FCC 16-38 adopted March 31, 2016, requesting that each surveyed subscriber verify under penalty of perjury that they, or a member of their household continue to participate in one of the means-based programs by the APSC as eligible for Lifeline funding. Lifeline subscribers who are subsequently determined to be ineligible shall be notified of their ineligibility in writing by the Company and provided 60 days from the date of such notice to rectify or otherwise demonstrate their eligibility prior to the discontinuance of their Lifeline benefits. All unresolved disputes regarding Lifeline or Linkup eligibility shall be brought to the attention of the APSC for resolution. (N) (N)
- c. Subscribers already enrolled will be subject to the rolling recertification's based on their current service initiation date. The rules establishing and related to rolling recertification will be effective for all enrollments made beginning on or after January 1, 2017. Under the FCC Third Report and Order and the Order of Reconsideration, FCC 16-38 (adopted March 31, 2016) the order establishes the creation of a National Verifier. Upon establishment of the National Verifier the Company will comply with the rules and regulations of the National Verifier system for determining subscriber lifeline eligibility. (N) | | | | (N)
- d. The Company will process all applications and apply the appropriate credit on the customer's monthly bill. A secondary service charge is not applicable for existing customers who subscribe to Lifeline Assistance.

Moundville Telephone Co., Inc.

Section 2
3rd Revised Sheet 7
Cancels 2nd Revised Sheet 7

S2. BASIC LOCAL EXCHANGE SERVICE

S2.14 Low-Income Assistance Programs (Continued)

A. Lifeline Assistance (Continued)

2. Regulations (Continued)

- e. As a participant in Lifeline Assistance, customers are eligible to receive Toll Limitation Service at no charge. This service will only be provided at the customer's request.
- f. Local service deposit requirements will be waived for customers who voluntarily receive Toll Limitation Service.
- g. Participants in Lifeline Assistance shall not be disconnected from Local Service for non-payment of toll charges. In addition, the Company will not deny re-establishment of local service to customers who are eligible for Lifeline Assistance and have previously been disconnected for non-payment of toll charges. Lifeline subscribers who have previously unpaid toll charges or are relying on someone in their household to establish eligibility for Lifeline who has previously unpaid toll charge will be required to subscribe to toll blocking by the Company. Lifeline Assistance will not be connected if an outstanding balance is owed by the customer for local service.
- h. Partial payments that are received from Lifeline customers will first be applied to local service charges and then to any outstanding toll charges.
- i. To increase Lifeline service stability, the FCC Order implements port freezes. A subscriber must stay enrolled in qualifying Lifeline supported broadband internet access service for twelve (12) months and with Lifeline supported voice telephone provider for sixty (60) days. Exception to these rules are:
 - 1. A subscriber who is moving to another location, or
 - 2. The service provider is ceasing to offer services in the area where the subscriber resides.
- j. One low income credit is available per residential household, pursuant to FCC Order 12-11 and the Third Report and Order, Further Report and Order and Order of Reconsideration FCC 16-38 adopted March 31, 2016. A household is any individual or group of individuals who are living together at the same address as one economic unit. A household may include related and unrelated persons. An "economic unit" consists of all adult individuals contributing to and sharing in the income and expenses of a household. An adult is any person eighteen years or older. If an adult has no or minimal income, and lives with someone who provides financial support to him/her, both people shall be considered part of the same household. Children under the age of eighteen living with their parents or guardians are considered to be part of the same household as their parents or guardians. A household is not permitted to receive Lifeline benefits from multiple providers.
- k. A Lifeline customer may subscribe to any local service offering available to other residential customers.
- l. The PIC charge will not be billed to Lifeline customers who subscribe to toll blocking and do not presubscribe to a long distance carrier.

Moundville Telephone Co., Inc.

Section 2
3rd Revised Sheet 8
Cancels 2nd Revised Sheet 8

S2. BASIC LOCAL EXCHANGE SERVICE

S2.14 Low-Income Assistance Programs (Continued)

A. Lifeline Assistance (Continued)

3. Credits

The following credits* will apply for each customer eligible for Lifeline Assistance:

	<u>Monthly Credit*</u>
a. Lifeline Credit①	\$ 9.25

The Company shall apply the baseline payments received by the administrator of the Federal Lifeline Assistance program to the qualifying customer's service, pursuant to FCC Order 12-11 and the Third Report and Order, Further Report and Order and Order of Reconsideration FCC 16-38 adopted March 31, 2016 and the APSC. (T) (N) (N)

Partial payments that are received from Lifeline customers shall first be applied to local service charges and then to any outstanding toll charges.

* Credit amount will not exceed the total of the basic Residential Local Exchange and Subscriber Line Charge.

①Rates are in compliance with FCC Order 12-11 and are effective on dates determined by the FCC under Order 12-11, and the Third Report and Order, Further Report and Order and Order of Reconsideration FCC 16-38 adopted March 31, 2016. (N) (N)

Moundville Telephone Company

Study Area Code: 250307

Response to Line 3010 – Milestone Certification (47 CFR §54.313(f)(1)(i))

Moundville Telephone Company (“Company”) hereby certifies that throughout 2016, it took reasonable steps to provide upon reasonable request broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream, with latency suitable for real-time applications, including Voice over Internet Protocol, and usage capacity that is reasonably comparable to comparable offerings in urban areas and that requests for such service are met within a reasonable amount of time. If a request for broadband service at actual speeds of at least 10 Mbps downstream/1 Mbps upstream is unreasonable, the Company offers broadband service at the highest available speed.